

2.0 PROPOSED ACTION

2.1 INTRODUCTION

The proposed action analyzed in this EIS is the disposal of the entire JPG facility, consisting of buildings and property. The JPG, consisting of 55,264 acres, includes 379 buildings, 196 miles of improved roads, and 48 miles of boundary fence line.

The disposal action requires pre-disposal activities, including cleanup of contaminated sites, determination of interim uses prior to final property transfer, determination of method of disposal, and a screening process to determine whether other DoD, federal, state, or homeless organizations may reuse the facilities. The property can be disposed of either as encumbered or unencumbered. Encumbered disposal would identify and incorporate reuse **constraints from** natural or human-made features. Unencumbered disposal would not have any reuse constraints, or the Army would take action to remove constraints before transferring the property. Encumbered and unencumbered disposal are discussed more fully in Chapter 3.

Army disposal of property will enable other federal or non-federal reuse. To facilitate community reuse planning, the EIS proposes and analyzes high, medium, and low intensity reuse scenarios. Since reuse of the installation, by future occupants is beyond the direct control of the Army, it is considered a secondary action. Because reuse is considered a secondary action to disposal, potential environmental effects from reuse are analyzed as indirect impacts of the proposed disposal action.

Both the disposal alternatives and reuse scenarios are further described in the following section. Methods of disposal and reuse are described in Chapter 3. The reuse plan developed by the local community provides the basis for estimates of the types and intensities of land uses that may occur at the JPG in the future.

2.1.1 Location

The JPG is located in southeastern Indiana, approximately eight miles north of the Indiana-Kentucky border. See Figure 2-1. The installation, occupying parts of Jefferson, Jennings, and Ripley Counties, is about 17.2 miles in length and ranges from four to six miles in width. Lands surrounding the JPG are predominantly farmland and woodlands, with there being some small towns and rural residential land use. See Figure 2-2. The JPG is located within 90 miles of Cincinnati, Ohio, Indianapolis, Indiana, and Louisville, Kentucky.

2.1.2 Mission

Until September 30, 1994, date of cessation of active operations at the JPG, the installation's mission was to perform production and post-production tests of conventional ammunition components and other ordnance items and to conduct tests of propellant ammunition/weapons systems and components for the U.S. Army. This and past similar missions have been performed at the JPG for more than five decades.

2.2 DISPOSAL PROCESS

Several major actions must be accomplished in order to prepare excess JPG property for disposal. Figure 2-3 outlines these actions and provides general timelines established for each of the disposal elements. The following subsections will further detail the action involved in the disposal process.

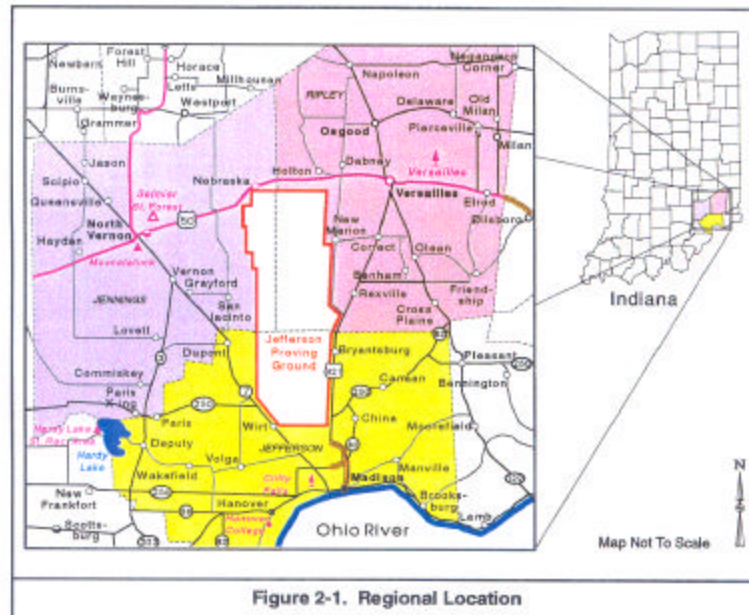


Figure 2-1. Regional Location

2.2.1 NEPA Documentation

In accordance with the CEQ's regulations implementing the NEPA, several documents have been prepared which analyze the environmental and socioeconomic consequences of actions as they relate to the congressionally mandated closure of JPG; realignment of personnel and functions from JPG to Yuma Proving Ground, Arizona and the subsequent disposal and eventual reuse of the JPG. The scope of this EIS has been discussed previously in Section 1.2.

2.2.2 Realignment of Personnel and Functions

Under the Defense Authorization Amendments and Base Realignment and Closure Act (Public Law 100-526), all mission activities at JPG must be relocated to other installations not later than September 30, 1995. The JPG ammunition acceptance testing mission is being realigned to Yuma Proving Ground, Arizona. Active operations ceased at the JPG on September 30, 1994. Completion of the physical movement of personnel and functions is slated for mid-1995.

At the time of decision to close, JPG supported 14 military and 407 civilian authorized positions. In fiscal year 1994, the JPG had a total of 101 authorized positions, reflecting

partial realignment by that time to the Yuma Proving Ground. At the end of calendar 1994, there were 182 personnel working at the JPG. Caretaker functions will be handled by an outside contractor. The number of personnel required to provide caretaker services has not been defined. It can be expected that the caretaker force would reduce in size as disposal of the property or parcels proceeds.

2.2.3 Environmental Compliance and Restoration

The process leading to the disposal or transfer of excess Army property includes certification that properties are suitable for disposal, and that environmental cleanup of contaminated sites is accomplished to the degree required by proposed future uses. The Army has taken several measures with respect to environmental compliance and remediation.

- Prior to the 1989 base closure announcement, there were limited environmental assessments conducted at the JPG. A Preliminary Assessment/Site Investigation was performed in the early 1980's and was updated in 1988. A remedial investigation was conducted in 1988 on the Gate 19 Landfill and three solvent disposal pits.
- Upon the JPG's being slated for closure in 1989, additional environmental assessments were completed. In March 1990, USATHAMA completed an enhanced preliminary assessment to address the environmental quality at the JPG. The enhanced preliminary assessment included visual inspection of the JPG and review of all available documents and files. As a result of this effort, 53 areas requiring environmental evaluation were identified. A follow-on Master Environmental Plan was completed in November 1990. This plan identified additional data needs and sampling requirements for the areas requiring environmental evaluation.
- In February 1992, EPA Region V completed a Draft RCRA Facility Assessment Report for the JPG. This report identified 86 solid waste management units.

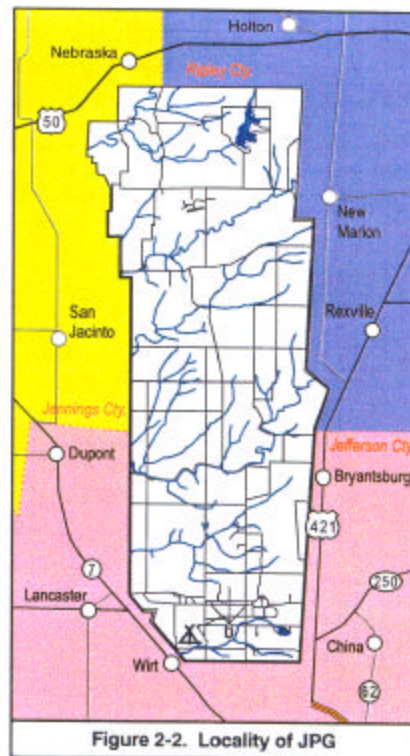
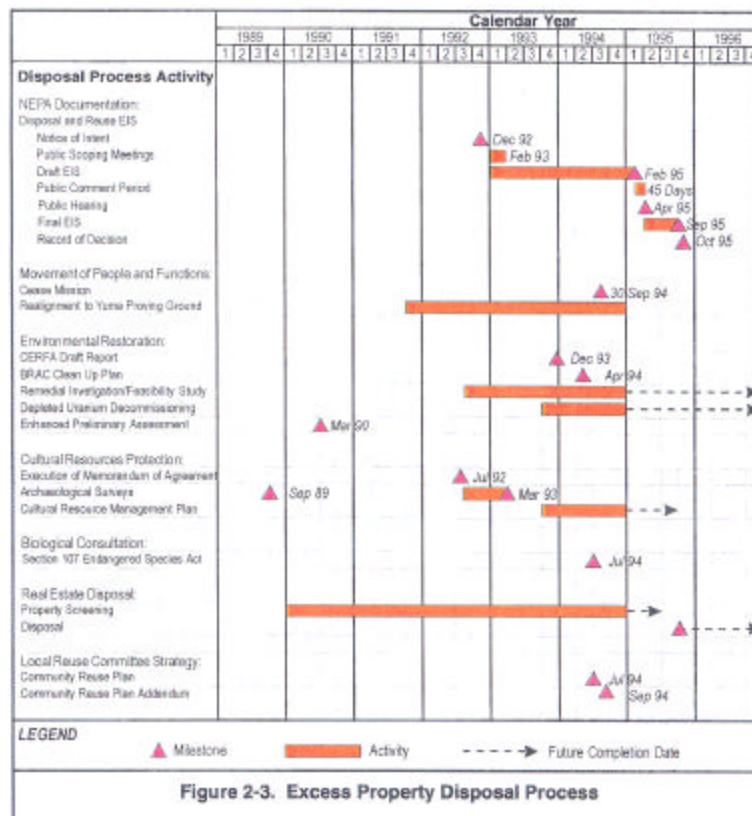


Figure 2-2. Locality of JPG



- The Army is performing a remedial investigation (RI) in the area south of the firing line, which consists of approximately 4,300 acres. The RI was initiated in 1992 to evaluate 50 sites. A draft report was submitted to the regulatory agencies (state and EPA) in July 1994. Numerous comments were received from the regulatory agencies regarding data quality and recommendations for additional sampling. Subsequently, the data quality concerns have been resolved and workplans for additional sampling were drafted in September 1995. Additional field work will proceed in the spring of 1996. The RI report is projected to be completed in late 1997 and the feasibility study would follow thereafter.
- Due to setbacks in the RI process, measures are underway to simplify and expedite other aspects of the cleanup process. Twenty-two sites are being proposed to be eliminated from the RI or deferred to another study for various reasons via no further action documents. Approximately 28 sites will remain in the RI. Approximately 9 sites are being proposed for voluntary removal actions to remove contaminant sources or cleanup the sites.

To Facilitate environmental restoration, the installation Base Realignment and Closure (BRAC) Environmental Coordinator has formed a BRAC Cleanup Team composed of the BRAC Environmental Coordinator, a representative of EPA Region V, and a representative of the Indiana Department of Environmental Management (IDEM). Based on the findings of the remediation studies, the BRAC Cleanup Team prepared its BRAC Cleanup Plan (Version I) to guide remediation. An installation Restoration Advisory Board has also been convened. The group, composed of interested citizens and co-chaired by the BRAC Environmental Coordinator, advises on formulation of the BRAC Cleanup Plan. All Restoration Advisory Board meetings are open to the public. The BRAC Cleanup Plan will address regulatory and public concerns and will plan remediation based on the priorities established by the community for reuse of the installation.

Public participation in the IRP process is separate and distinct from the process for this EIS. As shown in Figure 2-3, the restoration process will likely extend beyond the timeline established for the completion of this EIS.

Before any property transfer, an environmental report will be completed to describe environmental conditions and to identify any necessary land use restrictions, if applicable.

It is anticipated that JPG excess property will be disposed of by a number of smaller parcels versus disposal of the entire installation at one time. Therefore, specific remedial actions will be accomplished over a period of several years based on disposal priorities, the complexity of proposed remedial actions, and other pertinent factors.

2.2.4 Cultural Resources

The JPG property encompasses several potential archaeological sites and historic structures potentially eligible for listing on the National Register of Historic Places. A Memorandum of Agreement (MOA) in July 1992 with the SHPO and the Advisory Council on Historic Preservation obligates the Army to take affirmative actions in making determinations regarding the potential presence of archaeological resources at the installation. Studies supporting the MOA continue.

2.2.5 Biological Surveys

Several statutory and regulatory requirements for the protection and conservation of natural resources apply to Army actions like the disposal of the JPG property. These include the Sikes Act (16 USC 670a-f), the Fish and Wildlife Conservation Act (Public Law 96-366), the Endangered Species Act (Public Law 93-205), and the Migratory Bird Treaty Act (Public Law 99-645). Actions which may adversely affect federally listed threatened or endangered species requires consultation with the FWS. In January 1994, the JPG and the FWS entered into a memorandum of agreement for preparation of a fish and wildlife management plan to provide guidelines for managing fish and wildlife resources on the base. The FWS produced *Jefferson Proving Ground Fish and Wildlife Management Plan*, September 1994 in support of the natural resources management function at the JPG.

2.2.6 Real Estate Disposal

The disposal process for the JPG facility is governed by the Defense Authorization Amendments and Base Closure and Realignment Act, the Federal Property and Administrative Services Act of 1949, as amended, the Surplus Property Act of 1944, and the Federal Property Management Regulations. The Army must also comply with requirements

of the Stewart B. McKinney Homeless Assistance Act, Title XXIX of the 1994 Defense Authorization Act (Base Closure Communities Assistance, popularly known as the "Pryor Amendment"), and other laws and regulations such as Title 10, U.S. Code and Army Regulations affecting the disposition of federal real property

Section 2903 of Public Law 103-160 (the Pryor Amendment) established additional authority for the transfer of excess property at closed installations to affected communities and states. DoD published implementing guidance in the Federal Register on April 6, 1994 (32 CFR Parts 90 and 91) and an amendment on October 26, 1994. Pertinent elements of the real estate screening and disposal process are discussed below.

Disposal Process. The Army is presently involved in the property screening process pursuant to the Federal Property Management Regulations (41 CFR 101.47). These regulations provide for five primary methods for disposal:

e *Transfer to Another Federal Agency.* The Army would transfer administrative or jurisdictional control to another federal agency.

Assignment Pursuant to the McKinney Act The Army would assign the property to the U.S. Department of Health and Human Services, which would convey or lease the property to homeless providers.

Public Benefit Discount Conveyance. State or local government entities may obtain property at less than fair market value when sponsored by a federal agency for uses that would benefit the public (e.g., aviation, education, health, recreation, wildlife conservation, historic preservation, public highway, correctional facility). Local Redevelopment Authorities may submit an Economic Development Conveyance request to create new jobs.

Negotiated Sale. The Army would sell the property by negotiation to state or local agencies at fair market value.

Competitive Sale. Sale to the public would occur through either an invitation for bids or an auction.

To ensure that important natural and cultural resources are protected by all future owners, deed conditions or restrictions would be incorporated into bills of sale or other land transfer documents. Such conditions or restrictions could include special conservation easements to protect significant natural resources areas such as critical wildlife habitat areas. As appropriate, utilities easements will be referenced in or incorporated into property conveyance documents. Easements would also be required to allow the Army continued access for disposal and cleanup activities.

The Army may transfer the property as a whole, after all cleanup activities are complete, or in parcels as cleanup activities are completed or are in progress and approved by the EPA Regional Administrator. These methods allow environmentally uncontaminated parcels to be transferred while the cleanup process continues on other portions of the facility.

Screening Process. The method of disposal is determined by a four step screening procedure. This process assesses the demand for the facilities by the DoD, other federal agencies, homeless providers, state and local agencies, and public sale. The screening process is discussed below.

DoD Screening. Screening begins with departments and entities within DoD that may have uses for the facilities or the property. They can acquire it through an intra-agency property transfer without reimbursement; however, the Secretary must give priority to any department that agrees to pay fair market value on the basis of the use

of the property. DoD screening was completed on October 30, 1989. There were no requests from other DoD organizations for use of the JPG property.

Other Federal Agency Screening. The second step in screening involves offering the property to other federal agencies. If an agency has an interest in acquiring part or all of the property, it can be transferred, to include transfer of administrative and jurisdictional control. Federal agencies can also recommend use of the property for a specific public benefit purpose on behalf of a state or local governmental entity. If no federal agency expresses interest in the property, the property is declared surplus to the federal government. Screening for use of JPG by other Federal agencies is complete, with there being on March 31, 1994, a request by the FWS for transfer of approximately 53,000 acres.

McKinney Act Screening. The Stewart B. McKinney Homeless Assistance Act, as amended (42 U.S.C. 11301), permits Health and Human Services (HHS) approved providers of assistance to the homeless to receive high priority in acquiring unneeded land and buildings on federal properties. Surplus and excess property reported to the Department of Housing and Urban Development for a determination of suitability for use as a facility to assist the homeless is listed in the *Federal Register*. This announcement begins a 60-day holding period during which homeless providers may express interest in the property. Homeless providers indicating an interest in a listed property have an additional 90 days to submit a formal application to Health and Human Services. Upon receipt of a formal application, HHS has 25 days to review and complete all necessary actions. During the McKinney Act screening process, the property is not available for any purpose other than to assist the homeless.

The JPG facility includes 13 family housing units of possible interest to homeless assistance providers. The McKinney Act screening concluded in March 1995, with no expressions of interest.

State and Local Screening. Surplus property not acquired by homeless providers during the McKinney Act screening then becomes available to state and local governments. State and local entities may pursue three options for property transfer: public benefit conveyance, competitive sale, or negotiated sale. Public benefit conveyances include use restrictions and are typically granted for such as public airports, prisons, public education, recreation facilities, and historic monuments. A public benefit conveyance must be sponsored by a federal agency to be considered for transfer. The 1994 Defense Authorization Act also allows conveyance of property for less than fair market value or even at no cost for economic development and job creation, as proposed in President Clinton's Five Point Plan. To obtain such a conveyance, the Local Redevelopment Authority must receive approval from the Secretary of the Army for its Economic Development Conveyance request. The Economic Development Conveyance should only be used when other federal property disposal authorities for the intended land use cannot be used to accomplish the necessary economic redevelopment. The Section 2903 conveyance mechanism requires that the Army prepare an explanatory statement for its permanent files indicating why fair market value was not received.

Eligible public entities may also request negotiated sale of the federal property without the imposition of use restrictions. Unlike public benefit conveyances, negotiated sales attempt to secure a return for the federal government, which must obtain fair market value for the property. Surplus properties not claimed by state or local governments are then offered for public sale at fair market value. Disposal methods may include sealed bids, public auction, or negotiation. Surplus federal property disposed through public sale does not contain any federal use restrictions and is only bound by local zoning and land use regulations.

Current Status at JPG. The state and local property screening process concluded with expressions of interest from (1) Jefferson County for 645 acres in the cantonment area to create a public park, (2) the Port Authority of Madison, Indiana, for Building 216 and rail trackage in the cantonment area, and (3) the Southeastern Indiana Solid Waste District for Buildings 108/108A to serve as a regional processing center for recyclables. The Local Redevelopment Authority's Economic Development Conveyance application was rejected by the Army in June 1995.

Interim Uses. Because DoD cannot convey contaminated property until remediation efforts are in place and operating properly, leasing is often the only means to allow suitable economic reuse to occur on substantial portions of closing installations. The Military Leasing Act of 1956 (10 U.S. Code, §2667, as amended) permits the Army to implement interim leasing of excess facilities if it is in the public interest. Under this provision a lease cannot exceed one year, but it may be renewed annually by the Army for up to five years. A longer term lease may be instituted if it would promote national defense or be in the public interest. Interim uses cannot preclude any future Army options or irrevocably commit resources. Prior to any leasing or permitting, the Army must complete a Finding of Suitability to Lease documenting that the facility is clean and safe to use. Leased properties may be transferred by deed to future owners when the property is disposed. As circumstances develop, the Army intends to pursue these options if made available. To speed reuse by non-Army parties, the Army supports interim leasing of facilities at JPG.

2.2.7 Local Reuse Committee

In September 1993, officials of Jefferson, Jennings, and Ripley Counties, pursuant to state law, entered into a local cooperation agreement to form the Jefferson Proving Ground Regional Development Board (JPGRDB). The JPGRDB was designed, among other things, to oversee development of an economic diversification strategy and JPG reuse plan and to assist with implementation of identified redevelopment strategies. The local cooperation agreement provides for there being five members appointed by each county and staffing with a Redevelopment Coordinator.

In July 1994, the JPGRDB produced the *Jefferson Proving Ground Reuse Plan*. The reuse plan envisions initiation of numerous kinds of activities to replace the economic impacts caused by departure of the military mission. Types of activities presented in the reuse plan include agribusiness park, agribusiness/industrial park, wildlife refuge, commercial/public recreation, like-kind testing of weapons and ammunition, military/national guard training, unexploded ordnance research, solid waste management, prison/correctional facility, housing, aviation, corporate training, and reserve parcels for future initiatives.

In September 1994, the JPGRDB published an addendum to its reuse plan. The addendum provides more specific reuse alternatives for parcels throughout the JPG property. Included in the addendum were desires for use of the cantonment area for business and other types of development; a southeastern reserve parcel for roadway improvement, business development, unexploded ordnance research, or a solid waste management facility; a northeastern reserve parcel for a solid waste facility or unexploded ordnance research; a northeast corner parcel for agribusiness and economic development initiatives; a parcel near Holton, Indiana for business or economic development initiatives; a 500 foot right of way for roadway improvement along the base's northern border; northwestern parcels for business or economic development initiatives; small parcels at Graham and Little Graham Creeks for low-water crossing use; a southwestern reserve parcel for private party use as a national training facility; an air gunnery range for use by the Indiana Air National Guard; a 300 foot east-west bisecting corridor for roadway development; a 1,000 acre parcel for a solid waste management facility; a wetlands mitigation bank of indeterminate size; and an unexploded ordnance research facility site of indeterminate size or location.

Extracts of the July 1994 and September 1994 reuse plans are provided at Appendix B.

In 1995, a Local Redevelopment Authority was formed as the successor to the Jefferson Proving Ground Regional Development Board. Discussions between Army, FWS, and community representatives recognize the senior position of the **FWS in the disposal screening** process as discussed in the preceding section. Efforts have been made by all parties to accommodate both the local reuse plan and the FWS's proposal for creation of a wildlife refuge.

2.3 CARETAKER STATUS

Department of the Army Public Works Bulletin 420-10-8 (DA 1993) directs that inactive facilities and areas will be maintained to the extent necessary to insure, as applicable, weather-tightness, structural soundness, protection against fire and erosion, conservation of natural resources, and the prevention of major deterioration. These caretaker maintenance functions are to be accomplished with the minimum required staffing to maintain an installation in a state of repair that maintains safety, security, and health standards.

Upon closure but before its transfer or sale, the JPG facility will require caretaker management. The JPG property will remain fenced. Security will be provided and the facility closed to the public. The Army will provide limited maintenance of existing buildings and grounds maintenance such as mowing and pest control.

2.4 REUSE

Reuse of the JPG facility is viewed as being connected to the Army's disposal of the facility. Upon the Army's taking its primary action, the community or other entity (e.g., FWS) would take the secondary action of reuse. The following subsections describe the methodology used to formulate and evaluate the range of reuse activities that could occur.

2.4.1 Formulation of the Reuse Study Areas

A goal of this EIS is to develop and apply a methodology to analyze the full range of reuse activities likely to occur on portions of the installation available for disposal and reuse. In addition, the Army may have opportunities to make provisions for the disposal of portions of the installation as they are determined to be environmentally safe and available for reuse.

Analysis of potential environmental impacts is facilitated by dividing the JPG into study areas. Figure 2-4 identifies 12 study areas identified for the JPG. Criteria used to delineate the areas include consolidation of similar land use types and existing land use intensities, use of recognizable natural or man-made features, expression of interest by the FWS, proposals put forth by the JPGRDB, and creation of areas consistent with major reuse limitations (encumbrances) or management issues. The study areas should not be interpreted as proposed subdivided or marketable parcels. They have been defined only to facilitate the reuse impact analysis process. A description of each of the reuse areas is provided below, to include its proposed reuse as documented in the FWS request and the community reuse plan:

Study Area 1 (Wildlife Refuge). This study area encompasses 53,000 acres, all of the JPG except the central part of the cantonment area in the southernmost part of the base. It has been requested by the FWS.

Study Area 2 (Cantonment Area). This study area, occupying the southernmost section of the base, is approximately 4,320 acres. It encompasses most of the

structures and developed infrastructure, including an off-site pumphouse located on a small plot in Madison. This study area overlaps part of the FWS request with respect to the east and west portions of property south of the firing line. Under the community's reuse plan, upon disposal or transfer, Jefferson County may take possession of this area.

Study Area 3 (Southeastern Reserve Parcel). This study area on the east side of the JPG, extending northward from the firing line to the Jefferson-Ripley County line, encompasses roughly 1500 acres. It lies entirely in an area that the JPG has delineated as a safety zone along that edge of the installation. Under the community's reuse plan, upon disposal or transfer, Jefferson County may take possession of this area.

Study Area 4 (Northeastern Reserve Parcel). This study area on the east side of the JPG extends northward from the Jefferson-Ripley County line to a point just north of "H" Road. It is estimated to contain approximately 500 acres along the eastern perimeter of the base in an area the JPG has delineated as a safety zone. Under the community's reuse plan, upon disposal or transfer, Ripley County may take possession of this area.

Study Area 5 (Northeast Corner). This study area is located in the northeasternmost square mile (640 acres) of the JPG. The perimeter portion of this area, along the east and north borders of the base, occupies areas delineated by the JPG as a safety zone. Under the community's reuse plan, upon disposal or transfer, Ripley County may take possession of this area.

Study Area 6 (Holton Parcel). This parcel, consisting of 130 acres along the north border of the base, lies one mile south of Holton. It is just west of Study Area 5 and occupies an area the JPG has delineated as a safety zone. Under the community's reuse plan, upon disposal or transfer, Ripley County may take possession of this area. Development of this parcel would not occur unless and until construction of a four-lane highway across the northern border of the installation (see Study Area 7, below).

Study Area 7 (Right of Way). This study area consists of a 500 foot right of way along the entire northern border of the base. In an area the JPG has delineated as a safety zone, it is estimated that this study area contains about 240 acres. Under the community's reuse plan, upon disposal or transfer, the State of Indiana may take possession of this area.

Study Area 8 (Northwestern Parcel). This study area comprises about 400 acres in the northernmost tip of the northwest corner of the JPG. It is in an area delineated as a safety zone. Under the community's reuse plan, upon disposal or transfer Jennings County may take possession of this area.

Study Area 9 (Low-water Crossing). This study area encompasses two small plots, totaling less than 75 acres, where JPG roads cross Graham Creek and Little Graham Creek near the western border of the base. Under the community's reuse plan, upon disposal or transfer, Jennings County may take possession of these areas.

Study Area 10 (Southwestern Reserve Parcel). This study area encompasses 1,100 acres lying north of the firing line on the western border of the base. The study area measures about 3.5 miles in length from north to south and about 0.5 mile in width from west to east; the western one-half of the area is delineated by the JPG.

as a safety zone. Under the community's reuse plan, upon disposal or transfer, Jefferson County may take possession of this area.

Study Area 11 (Air Gunnery Range). This area comprises 1,033 acres in the center of the base, about three miles from the northern border of the base. Under the community's reuse plan, upon disposal or transfer, Ripley County may take possession of this area.

Study Area 12 (East-West Corridor). This study area is a 300 foot right of way bisecting north and south sectors of the base. The study area, running east and west, straddles "H" Road and represents approximately 140 acres. Under the community's reuse plan, upon disposal or transfer, the State of Indiana may take possession of this area.

The parcels shown in Figure 2-4 overlap, mostly with areas requested by the FWS. For instance, property in the northeast corner of the JPG, denominated as Study Area 5, has been identified by both the FWS as part of its proposed wildlife refuge and by Ripley County as an economic development area. It is anticipated that, upon the FWS's amendment of its request from 53,000 to 45,000 acres, the property would be identified solely for development under Ripley County auspices.

Three potential study areas suggested by the JPGRDB are considered within other JPGRDB proposals. Specifically, the JPGRDB's identification on September 20, 1994 (see Appendix B) of a 1,000 acre solid waste management facility on the eastern perimeter of the base (between the firing line and "I" Road), unspecified areas to be used for wetlands mitigation banking, and a site for an unexploded ordnance research facility all fall within existing parcels.

2.4.2 Reuse Development Process

Closure and disposal of DoD installations have demonstrated the difficulty inherent in predicting impacts of reuse of properties. Local land use planning and zoning decisions, market and economic forces, legal requirements, and individual developer actions exert considerable variability on reuse. In many cases, land use cannot be known until an owner actually takes control of property, obtains local zoning approval for his or her intentions, and proceeds to execute those plans.

Despite difficulties inherent in making predictions, the Army's requirement to comply with NEPA must proceed. To address various reuse possibilities, the Army has identified three reuse scenarios based on relative levels of development intensity which could reasonably occur on the JPG property. These reuse intensity scenarios allow identification of the range of potential environmental impacts that could arise from present and future land use plans as they evolve. They provide flexibility to accommodate changes in the Reuse Plan so that additional environmental impacts analyses may not be required regardless of ultimate reuse actions taken. Information about these potential impacts helps meet the public's and the Army's needs for informed decision making as envisioned in the NEPA statute. The three reuse scenarios to be evaluated in this EIS are: High Intensity Reuse Scenario, Medium Intensity Reuse Scenario, Low Intensity Reuse Scenario.

More detail on the formulation of these reuse options is discussed in Section 3.4. Based on the specific reuse plans developed by other parties, additional environmental documentation may be necessary. This documentation would be prepared by the future owners of the JPG.

